

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

Dong Huang

Plaintiff,

v.

John Doe,

and

<330.com>

Defendants

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) Case No. _____
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DECLARATION OF DONG HUANG

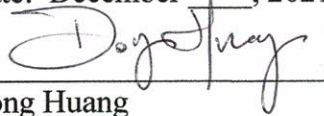
Dong Huang, declares under the penalty of perjury as follows:

1. My name is Dong Huang, I am over the age of 18 and competent to make this declaration. The facts stated herein are within my personal knowledge and are true and correct.
2. I acquired the Defendant Domain Name on November 6, 2018 with a renewal period of 9.326 years, through February 6, 2027
3. I obtained the Defendant Domain Name as part of my business involving the purchase and sale of domain names for profit making the domain name a fungible good of value which I use in commerce.
4. The Defendant Domain Name is extremely valuable and its loss has deprived me of the ability to sell the domain name. The Defendant Domain Name is worth approximately five hundred thousand dollars (\$500,000)

5. I controlled the domain name through huangdong1910js@gmail.com.
6. My registrar account is maintained on a protected computer system and access to the account should be restricted to only myself with access through my username and password.
7. Defendant Doe somehow gained access to my registrar account on or about November 12, 2021, although it is possible that the unauthorized access occurred earlier.
8. I did not sell or transfer <330.com.>
9. Defendant Doe's registration and use of the Defendant Domain Name is without my authorization
10. Defendant Doe has no legitimate basis to claim a valid ownership interest in <330.com.>
11. As I am fluent in English, I was able to review the Verified Complaint and am by this affidavit stating under penalty of perjury that the facts contained in the Verified Complaint are true and correct.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: December 1, 2021


Dong Huang